

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: Gerald R. Galleshaw :  
Debtor :  
 :  
DAVID C. FRAIOLI and NEW :  
ENGLAND AUTO CENTER, INC. :  
Plaintiffs/Counterclaim Defendants : CASE NO: 15-11047  
 :  
V. :  
 : CHAPTER 7  
 :  
GERALD R. GALLESHAW, : ADV. PRO. NO.: 15-01023  
Defendant/ Counterclaim Plaintiff :

**PLAINTIFFS/COUNTERCLAIM DEFENDANTS, DAVID C. FRAIOLI AND NEW  
ENGLAND AUTO CENTER, INC'S OBJECTION TO DEFENDANT/COUNTERCLAIM  
PLAINTIFF, GERALD R. GALLESHAW, APPLICATION TO CLERK FOR ENTRY OF  
DEFAULT**

Plaintiffs/Counterclaim Defendants, David C. Fraioli ("Fraioli") and New England Auto Center, Inc. ("NEAC") (Fraioli and NEAC are at times collectively referred to as "Plaintiffs") hereby objects to Defendant/Counterclaim Plaintiff, Gerald R. Galleshaw's ("Galleshaw") Application to Clerk for Motion for the Entry of Default. As grounds therefore, the Plaintiffs have filed their answer.

David C. Fraioli and  
New England Auto Center, Inc.  
By its Attorneys,

/s/ Ryanna T. Capalbo  
Andrew R. Bilodeau, Esq. #7174  
Ryanna T. Capalbo, Esq. #8314  
Bilodeau Carden Capalbo, LLC  
51 Jefferson Blvd, Suite 2  
Warwick, RI 02888  
(401) 461-7700  
(401) 633-7511  
Email: [rcapalbo@bilodeaucarden.com](mailto:rcapalbo@bilodeaucarden.com)  
Dated: May 5, 2016

CERTIFICATION

I hereby certify that on the 5<sup>th</sup> day of May, 2016, I electronically filed a true and accurate copy of the within document to be sent via electronic means with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System and via email to the following:

Todd Dion, Esq.  
Law Office of Todd S. Dion  
1599 Smith Street  
North Providence, RI 02911

/s/ Ryanna T. Capalbo, Esq.  
Ryanna T. Capalbo, Esq., #8314